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*Attorneys for Defendant Brian Moynihan, doing business as CEO Bank of America*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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DASHAWN A. LARODE,	:	
	:	Case No. 1:24-cv-08622-HG-LB
Plaintiff,	:	
	:	<b>DECLARATION OF SHAN P.</b>
v.	:	<b>MASSAND IN SUPPORT OF</b>
	:	<b>DEFENDANT BRIAN MOYNIHAN,</b>
BRIAN MOYNIHAN d/b/a CEO BANK OF	:	<b>DOING BUSINESS AS CEO BANK OF</b>
AMERICA, JOHN ROSATTI d/b/a CEO	:	<b>AMERICA'S MOTION TO DISMISS</b>
PLAZA AUTO MALL AND GEORGE	:	<b><u>PLAINTIFF'S COMPLAINT</u></b>
BADEEN d/b/a ALLIED FINANCE	:	
ADJUSTERS/NYCR INDUSTRIES CORP.,	:	
	:	
Defendants.	:	
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I, Shan P. Massand, hereby declare as follows:

1. I am an attorney with the law firm McGuireWoods LLP, attorneys for Defendant Brian Moynihan, doing business as CEO Bank of America ("Defendant") in the above-captioned action. As counsel for Defendant, I am familiar with the pleadings, facts, and circumstances in this action.

2. Attached hereto as **Exhibit A** is a true and accurate copy of Plaintiff's Complaint filed on December 18, 2024. (*See also* ECF No. 1.)

3. Attached hereto as **Exhibit B** are true and correct copies of the cases or other authorities to be provided to *pro se* litigants pursuant to Local Civil Rule 7.2.

I declare under the penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: New York, New York

May 13, 2025

/s/ Shan Massand  
Shan P. Massand